## **EXHIBIT F**

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May 6, 2014

## **VIA E-MAIL AND U.S. MAIL**

Mario Moore, Esq. Morgan, Lewis & Bockius LLP 5 Park Plaza, Suite 1750 Irvine, CA 92614 (949) 399-7193

Re: Audatex North America, Inc. v. Mitchell International, Inc., No. 3:13-cv-

01523-BEN (BLM) (D. Del.)

## Dear Mario:

Thank you for personally attending the meet and confer at our offices yesterday morning. Following is a high-level summary of a number of items we discussed during that meeting.

With respect to the supplementation of Mitchell's interrogatory responses, the parties agreed that Mitchell will further supplement its responses to Audatex Interrogatory Nos. 2, 4-15 and 17 by Monday, May 12, 2014. Mitchell also agreed to supplement its responses to Interrogatory Nos. 3 and 16, and to consider further whether it will supplement its present response to Interrogatory No. 1. Mitchell agreed to let us know by tomorrow (Wednesday, May 7) its position on these three interrogatories, including timing of supplementation. Audatex has requested supplemental responses on these no later than Friday, May 16.

The parties agreed that Mitchell would make source code utilized by the accused instrumentalities available for Audatex's inspection sometime in mid-May (we proposed May 15, 2014). Mitchell stated its intention to promptly provide Audatex with the date the code will be available, as well as an identification of the language in which such source code is written.

The parties agreed that Mitchell would produce documents responsive to the requests identified in Audatex's April 9, 2014 letter, with priority given to documents that would aid in the identification of ESI custodians. Mitchell agreed that production of these documents would be performed on a rolling basis throughout this month, and in any event completed by the end of May.

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Although we did not discuss the specific items raised in Mitchell's recent correspondence regarding Mitchell's interrogatories and requests for production, Audatex agreed to review and respond. Audatex indicated that it does intend to supplement interrogatory responses based on further investigation. Audatex also indicated an intent to produce documents on a rolling basis, giving priority to organization chart documents as requested by Mitchell.

Very truly yours,

Patrick McGill

PM